

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE [DBP/USPS-77 through 78]]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

September 14, 2011

Respectfully submitted,

N20111o77

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-77 Please refer to your response to Interrogatory DBP/USPS-67.

[a] Please confirm, or explain if you are unable to confirm, that the mail forwarding policies and costs will be the same whether the customer's change of address results from the discontinuance of a facility or results from an actual move by the customer.

[b] Please confirm, or explain if you are unable to confirm, that when a post office is discontinued and a change of address is filed by a customer it will result to some categories of mail that will be forwarded postage due and the customer will have a cost if they want to receive the mail.

[c] Please confirm, or explain if you are unable to confirm, that when a post office is discontinued and a change of address is filed by a customer it will result to some categories of mail that will not be forwarded to the customer.

[d] Please explain why the customer who has been affected by the discontinuance of his facility by the action of the Postal Service will either have to pay postage due to receive some of his mail and/or will not receive all of the mail which was sent to his old address.

DBP/USPS-78 Please refer to your response to Interrogatory DBP/USPS-69.

For each of the different categories of facilities that are being studied for discontinuance or consolidation, approximately what percentage of the transactions that take place would still be able to be transacted at each of the different types of alternate access facilities being considered?

I am not interested in the ratio of TYPES of transactions [as indicated by a check mark] but I am interested in the NUMBER of transactions. For example, if one is to consider the discontinuance of an independent post office and its replacement by a stamp consignment location. Assume that for a given period of time the independent post office conducted a total of one hundred customer transactions. These consisted of fifteen transactions of selling booklets of twenty Forever stamps [the only transaction type that can be accomplished at a stamp consignment location], twenty transactions of selling 29¢ post card stamps, and the remaining sixty-five transactions of accepting Media Mail parcels. In this case 15% of the transactions conducted at an independent post office can be transacted at a stamp consignment location since 15 transactions could be completed out of a total of 100 transactions.